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Attorneys for [PROPOSED] Plaintiff-Intervenor
YUHA'AVIATAM OF SAN MANUEL NATION,
a federally recognized Indian tribe, also federally
recognized as SAN MANUEL BAND OF MISSION INDIANS

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION – RIVERSIDE

BLUETRITON BRANDS, INC.,

Plaintiff,

v.

UNITED STATES FOREST SERVICE,

RANDY MOORE, in his official capacity
as Chief of the U.S. Forest Service,

CHRISTOPHER FRENCH, in his
official capacity as Deputy Chief for the
National Forest System of the U.S. Forest
Service,

JENNIFER EBERLEIN, in her official
capacity as Regional Forester for the
Pacific Southwest Region of the
U.S. Forest Service,

Case No.: 2:24-cv-09720-JGB-DTB

**DECLARATION OF ALEXANDRA
MCCLEARY IN SUPPORT OF
MOTION TO INTERVENE AND
MOTION FOR PRELIMINARY
INJUNCTION**

Hearing Date: February 3, 2025

Hearing Time: 9:00 AM

Courtroom: 1

Judge: Hon. Jesus G. Bernal

Action Filed: August 6, 2024

1 DANELLE HARRISON, in her official
2 capacity as Forest Supervisor of the San
Bernardino National Forest of the
U.S. Forest Service,

3 MICHAEL NOBLES, in his official
4 capacity as Front Country District Ranger
of the U. S. Forest Service,

5 Defendants.

6 YUHA AVIATAM OF SAN MANUEL
7 NATION, a federally recognized Indian
tribe, also federally recognized as SAN
8 MANUEL BAND OF MISSION
INDIANS,

9 [Proposed] Plaintiff-Intervenor.

1 I, ALEXANDRA MCCLEARY, declare as follows:

2 1. I am the Director of Cultural Resources Management for the
3 Yuhaaviatam of San Manuel Nation, a federally recognized Indian tribe, also
4 federally recognized as the San Manuel Band of Mission Indians (the Nation), and
5 on whose behalf I submit this declaration. The facts set forth herein are based on
6 my personal knowledge, and if called as a witness, I could and would testify
7 competently thereto.

8 2. I have a Bachelor of Arts in Anthropology from Barnard College,
9 Columbia University and a Master of Arts and a Doctorate of Philosophy in
10 Anthropology from the University of California, Berkeley. I began my employment
11 with the Nation in August 2019 as its archeologist and assumed my role as its
12 Director of Cultural Resources Management in April 2024. In this capacity, I
13 supervise a staff that includes an ethnobotanist, several archaeologists, a cultural
14 lands manager, tribal archivist, repatriation, and collections manager, and
15 educational program manager. I oversee the Tribal Historic Preservation Office
16 which is responsible for assuming the role of a State Historic Preservation Officer
17 on Tribal lands. As such, I am responsible for preserving the Nation's historical
18 records, cultural artifacts and culturally significant properties, and protecting the
19 Nation's interests within its ancestral territory. I oversee consultations on projects
20 within the Nation's ancestral lands that impact the Nation's cultural resources
21 pursuant to federal and state law, including but not limited to the National Historic
22 Preservation Act and California Environmental Quality Act. In my work, I am
23 familiar with the scope of the Nation's ancestral territory, having familiarized
24 myself with historical documents demonstrating where the Nation's predecessors
25 lived prior to colonization. Arrowhead Springs and Strawberry Canyon lie within
26 the Nation's ancestral territory and are considered culturally significant sacred sites,
27 as defined in Executive Order 13007.
28

1 3. Citizens of the Nation are Yuhaaviatam, which is a clan, or sub-set, of
2 a larger ethnic group most commonly known as the Serrano people. The term
3 “Serrano” was originally employed by Spanish colonists. However, the indigenous
4 term for Serrano people is “Maara’yam.” Prior to European contact, there used to
5 be many clans of Maara’yam (Serrano) people, all connected by language, kinship,
6 and culture, while maintaining their own distinct political sovereignty.
7 Yuhaaviatam clan territory lies within the San Bernadino Mountains. Yuhaaviatam
8 translates to “People of the Pines.”

9 4. While the Nation’s traditional clan territory lies within the San
10 Bernardino mountains, Maara’yam (Serrano) ancestral territory covered over 7.4
11 million acres of land, including present-day Antelope Valley on the west, southwest
12 Mojave Desert to the north, portions of San Gabriel and San Bernadino mountains
13 in the center, the Inland Empire to the south, and the City of Twentynine Palms to
14 the east.

15 5. The Nation believes that, as the Yuhaaviatam clan of Maara’yam
16 (Serrano), their Creator Kūktac bestowed on them the responsibility to steward all
17 of Maara’yam (Serrano) ancestral territory.

18 6. In 1891, the U.S. Congress passed the Act for the Relief of the Mission
19 Indians in the State of California (Act), leading to administrative agency action that
20 reaffirmed the Nation as a federally recognized Indian tribe with inherent rights as a
21 sovereign nation. The Act also led to the establishment of the San Manuel
22 Reservation, whereby the federal government reserved 655-acres with little usable
23 land or water just above the City of Highland. The Nation’s name acknowledges
24 their historical exposure to the Spanish Mission system and honors Maara’yam
25 (Serrano) ancestor Santos Manuel, who led his people from the genocidal campaign
26 that forced them from their Serrano homelands, like Arrowhead Springs, in years
27 prior.
28

1 7. The Arrowhead Springs property is an approximately 2,000-acre
2 property in the Waterman Canyon of San Bernadino and is located close to the San
3 Manuel Reservation. In an effort to reclaim and steward ancestral lands, the Nation
4 purchased Arrowhead Springs property in May 2016.

5 8. The Arrowhead Springs property is part of the Nation's aboriginal
6 homelands. Indeed, the Nation's ancestors resided in an ancient village known as
7 Apuiva't located in the vicinity of what is today known as the Arrowhead Springs
8 property. The Arrowhead Springs property includes a portion of the hillside that
9 features a large arrowhead-shaped natural landmark. The Nation owns the
10 southernmost tip of the Arrowhead; the rest is owned by the United States Forest
11 Service. The Nation is seeking a land exchange with the United States Forest
12 Service for land that would include the remaining portion of the Arrowhead. The
13 Nation's ancestors used the natural hot springs located throughout the Arrowhead
14 Springs property, which were considered by them to be uniquely sacred and
15 medicinal. The cold water flowing through the property, including Strawberry
16 Creek, was also important to Maara'yam (Serrano) people through time, due to the
17 dependability of this water source and its capacity to support a variety of flora and
18 fauna.

19 9. The current Arrowhead Springs hotel was built in 1939. The hotel was
20 a vacation destination for Hollywood stars and the elite in its early days. However,
21 the Arrowhead Springs property was commissioned as a Naval Hospital during
22 World War II. After the war concluded, the Arrowhead Springs Hotel returned to its
23 use as a hotel. In 1962, the Arrowhead Springs property was purchased by Campus
24 Crusade for Christ to be used as its headquarters. The Nation purchased the
25 property from Campus Crusade for Christ in May 2016.

26 10. It is my professional opinion that the Arrowhead Springs property is
27 eligible for listing on the National Historic Preservation Act's National Register of
28 Historic Places due to its deep, enduring, and multifaceted history. Most

1 significantly, it is eligible as a Traditional Cultural Property, as it is significant to
2 the Maara'yam (Serrano) people's beliefs, heritage, and cultural identity, and as
3 being a place where the San Manuel community has traditionally carried out
4 cultural and religious practices. The archaeological footprint on the property
5 resulting from thousands of years of indigenous occupation is significant for its
6 ability to yield important information about the history of Maara'yam (Serrano)
7 people as well as later historical occupation. Since being developed by Anglo-
8 European settlers including David Noble Smith in the 1860s, the property is eligible
9 for its association with the international "health seeker" and sanatorium movement
10 of the mid-19th to early 20th centuries. This movement is an important historical
11 and cultural developmental theme which was driven in large part by the railroad-
12 inspired Southern California real estate boom of the late 1880s. The current hotel
13 and many adjacent structures built between 1939 and 1955 are closely associated
14 with the Southern California entertainment industry and the Golden Age of
15 Hollywood. Both the hotel's interior and exterior design embody the distinctive
16 characteristics of Paul Revere Williams and Dorothy Draper, respectively, two
17 widely celebrated masters of design who defined the glamorous Hollywood
18 Regency style of the era.

19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct.

21
22 Executed this 2nd day of January, 2025 at San Manuel Reservation.

23
24 
ALEXANDRA MCCLEARY

25
26 Director of Cultural Resources
27 Management for the Yuhaaviatam of
28 San Manuel Nation